

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF PUERTO RICO**

In re

Vicky Rodríguez Torres
Debtor

Bankruptcy Case 09-10864 (BKT)

CHAPTER 7

Vicky Rodríguez Torres
Plaintiff

Adversary Proc. 10-00137 (BKT-7)

v.

18 U.S.C. §1030

18 U.S.C. §2510

18 U.S.C. §2701

**Enid López-López, Guillermo Camba-Casas,
Mariela Rexach Rexach, Government
Development Bank of P.R., et als.**
Defendants

42 U.S.C. §1983

42 U.S.C. §1985

42 U.S.C. 1988

TORTS

**MOTION TO JOIN MOTION TO DISMISS
UNDER FED. R. CIV. P. 12(b)(6) AND 12(b)(1)**

TO THE HONORABLE COURT:

COMES NOW, Co-Defendants, Guillermo Camba-Casas (“Camba”) and Enid López-López (“López”), through the undersigned counsel and respectfully represent and pray:

1. On August 9, 2010, Plaintiff filed the present adversary complaint against the appearing Co-Defendants, and also against Mariela Rexach Rexach (“Rexach”) and the Governmental Development Bank for Puerto Rico (“GDB”). See Dkt. 1.

2. In view of Plaintiff’s deficient service of the summons and copy of the complaint upon the appearing co-defendants, on October 5, 2010, this Honorable Court ordered Plaintiff to serve new summons upon Camba and López. See Dkt. 25.

3. On November 4, 2010, the Clerk of the Court issued new summons to be served upon Camba and López. See Dkts. 53-54.

4. On or around November 17, 2010 and November 22, 2010, respectively, López and Camba received the summons and copy of the Complaint.

5. Pursuant to Rule 7012(a) of the Federal Rules of Bankruptcy Procedure, “[i]f a complaint is duly served, the defendant shall serve an answer within 30 days after the issuance of the summons, except when a different time is prescribed by the court.”

6. Camba and López have examined the motion to dismiss filed on September 21, 2010 (Dkt. 11) by Co-Defendants, Rexach and GDB, and both agree with the arguments contained therein, as they are equally applicable to them.

7. Said motion to dismiss is currently under consideration of this Honorable Court.

8. In view of the above, Camba and López respectfully join the motion to dismiss filed by Co-Defendants Rexach and GDB (Dkt. 11) and, pursuant to Rule 10(c) of the Federal Rules of Civil Procedure (applicable to adversary proceedings by virtue of Rule 7010 of the Federal Rules of Bankruptcy Procedure), adopt by reference each and every argument set forth in said motion to dismiss.

WHEREFORE, Defendants respectfully join the motion to dismiss filed by Co-Defendants Rexach and GDB on September 21, 2010 (Dkt. 11) and request this Honorable Court to deem said motion to dismiss as Camba and López’s responsive pleading, with such further relief as the Court may deem proper and just.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 6th day of December, 2010.

WE HEREBY CERTIFY that on this same date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent to the parties by operation of the Court’s electronic filing system. Parties may access this filing through the Court’s

system. In addition, a copy of this motion was sent on this same date to the following CM/ECF non-participant: Vicky Rodríguez Torres, 650 Sergio Cuevas, Apt. 1911, San Juan, P.R. 00918.

SCHUSTER AGUILÓ LLP
Attorneys for GDB
PO Box 363128
San Juan, Puerto Rico 00936-3128
Telephone: (787) 765-4646
Telefax: (787) 765-4611

s/Andrés C. Gorbea-Del Valle
Andrés C. Gorbea-Del Valle
USDC PR No. 226313
agorbea@salawpr.com

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